

1 Elliott H. Stone, Esq. (SBN 264569)
ehstone@stonelawpc.com
2 **STONE LAW FIRM**
6601 Center Drive – Suite 500
3 Los Angeles California 90045
Telephone: (310) 348-7000
4 Facsimile: (844) 329-9100

5 Attorney for Plaintiff JAMES TRULY

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
CENTRAL DIVISION – LOS ANGELES

11 JAMES TRULEY, an individual,
12 Plaintiff,

13 V.

SHLOMO RECHNITZ, individually
and dba ROCKPORT HEALTHCARE
SERVICES, and dba ALTA VISTA
HEALTHCARE & WELLNESS
CENTER; ROCKPORT
ADMINISTRATIVE SERVICES,
LLC., a California limited liability
company; DINCEL LAW GROUP, an
entity of unknown type; KIM O.
DINCEL, an individual; W. JOHN LO,
an individual; RIVERSIDE
HEALTHCARE &
WELLNESS CENTRE, LLC, a
California limited liability company;
Tim G. Doe, an individual, Cecilia M.
Doe, an individual, and DOES 1 to 50,
inclusive, an individual; and DOES to 1
to 50, inclusive,

Defendants.

Case No.: 5:15-cv-00715-SJO-SP

**PLAINTIFF'S RESPONSES TO
DEFENDANTS DINCEL LAW GROUP
APC, KIM O. DINCEL AND W. JOHN
LO'S FIRST SET OF SPECIALLY
PREPARED INTERROGATORIES,
REQUESTS FOR PRODUCTION OF
DOCUMENTS SET ONE, AND FIRST
SET OF REQUESTS FOR ADMISSION,**

25 PROPOUNDING PARTY: DEFENDANTS DINCEL LAW GROUP APC, KIM
26 O. DINCEL AND W. JOHN LO

27 | RESPONDING PARTY: JAMES TRULEY

PLAINTIFF'S RESPONSES TO DEFENDANTS DINCEL LAW GROUP APC, KIM O. DINCEL AND W. JOHN LO'S FIRST SET OF SPECIALLY PREPARED INTERROGATORIES, REQUESTS FOR PRODUCTION OF DOCUMENTS SET ONE, AND FIRST SET OF REQUESTS FOR ADMISSION

1 SET: ONE

2 **GENERAL OBJECTIONS AS TO ALL OF DEFENDANTS'**

3 **DISCOVERY REQUESTS**

4 Plaintiff object generally to the instructions and definitions provided by
5 Defendant in its discovery requests to the extent that they seek to impose a greater
6 burden or duty on Plaintiffs than that required under the Federal Rules of Civil
7 Procedure. Plaintiff also objects to Defendant's provision of unusual or extraordinary
8 meanings to words or phrases. Plaintiffs will respond only using the plain-English
9 meanings of the words and phrases used by Defendants in their interrogatories and
10 requests. Plaintiff objects to the extent that Defendants have attempted to modify
11 these plain-English meanings in any way that seeks to impose a greater burden or duty
12 on Plaintiff than that which is imposed by the Federal Rules of Civil Procedure.

13

14 **INTERROGATORIES**

15 **SPECIAL INTERROGATORY 1:**

16 IDENTIFY all facts that support YOUR contention that Defendant DINCEL
17 LAW GROUP, APC is a business the principal purpose of which is the collection of
18 debts.

19 **RESPONSE:**

20 OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has
21 no legal training. Notwithstanding and without waiving said objections,
22 Plaintiff states and alleges as follows: See the operative complaint for the
23 factual basis that Defendant DINCEL LAW GROUP, APC is a business
24 the principal purpose of which is the collection of debts. In addition, all
25 of the communications Plaintiff received from DINCEL LAW GROUP
26 indicated they were a business the principal purpose of which is the
27 collection of debts including but not limited to the demand letters sent by

1 DINCEL LAW GROUP to Plaintiff. Plaintiff reserves the right to
2 seasonably supplement this response. Discovery continues.

3 **SPECIAL INTERROGATORY 2:**

4 IDENTIFY all facts that support YOUR contention that Defendant KIM O.
5 DINCEL regularly acquires and/or collects debts after they are in default.

6 **RESPONSE:**

7 OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has
8 no legal training. Notwithstanding and without waiving said objections,
9 Plaintiff states and alleges as follows: See the operative complaint for the
10 factual basis that Defendant KIM O. DINCEL regularly acquires and/or
11 collects debts after they are in default. In addition, all of the
12 communications Plaintiff received from defendants indicated the
13 purported debt was in default. Plaintiff reserves the right to seasonably
14 supplement this response. Discovery continues.

15 **SPECIAL INTERROGATORY 3:**

16 IDENTIFY all facts that support YOUR contention that Defendant KIM O.
17 DINCEL regularly acquires and/or collects debts after they are in default.

18 **RESPONSE:**

19 OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has
20 no legal training. Notwithstanding and without waiving said objections,
21 Plaintiff states and alleges as follows: See the operative complaint for the
22 factual basis that Defendant KIM O. DINCEL regularly acquires and/or
23 collects debts after they are in default. In addition, all of the
24 communications Plaintiff received from this defendant indicated the
25 purported debt was in default and being collected by this defendant.
26 Plaintiff reserves the right to seasonably supplement this response.
27 Discovery continues.

1 **SPECIAL INTERROGATORY 4:**

2 IDENTIFY all facts that support YOUR contention that Defendant DINCEL
3 LAW GROUP, APC regularly acquires and/or collects debts after they are in default.

4 **RESPONSE:**

5 OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has
6 no legal training. Notwithstanding and without waiving said objections,
7 Plaintiff states and alleges as follows: See the operative complaint for the
8 factual basis for Plaintiff's contention that Defendant KIM O. DINCEL
9 regularly acquires and/or collects debts after they are in default. In
10 addition, all of the communications Plaintiff received from propounding
11 defendants occurred after the non-attorney defendants claimed the
12 purported debt was in default. Plaintiff reserves the right to seasonably
13 supplement this response. Discovery continues.

14 **SPECIAL INTERROGATORY 5:**

15 IDENTIFY all facts that support YOUR contention that each Defendant in this
16 action were the principal, agent or employee of the other.

17 **RESPONSE:**

18 OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has
19 no legal training. Notwithstanding and without waiving said objections,
20 Plaintiff states and alleges as follows: See the operative complaint for the
21 factual basis that each Defendant in this action were the principal, agent
22 or employee of the other. In addition, all of the communications Plaintiff
23 received from propounding defendants indicated they were retained
24 and/or working on behalf of the other named defendants. Plaintiff
25 reserves the right to seasonably supplement this response. Discovery
26 continues.

1 **SPECIAL INTERROGATORY 6:**

2 IDENTIFY all facts that support YOUR contention that at all times Defendants
3 were acting within the course and scope of their principal relationship, agency, or
4 employment.

5 **RESPONSE:**

6 OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has
7 no legal training. Notwithstanding and without waiving said objections,
8 the operative complaint contains no such contention it merely states the
9 forgoing is based on information and belief. Plaintiff reserves the right to
10 seasonably supplement this response. Discovery continues.

11 **SPECIAL INTERROGATORY 7:**

12 IDENTIFY all facts which support YOUR contention that Defendants obtained
13 money and/or property through fraud, negligence, misrepresentation, and other
14 wrongful and/or illegal conduct.

15 **RESPONSE:**

16 OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has
17 no legal training. Notwithstanding and without waiving said objections,
18 Plaintiff states and alleges as follows: See the operative complaint for the
19 factual basis that each Defendant obtained money and/or property
20 through fraud, negligence, misrepresentation, and other wrongful and/or
21 illegal conduct. Plaintiff reserves the right to seasonably supplement this
22 response. Discovery continues.

23 **SPECIAL INTERROGATORY 8:**

24 IDENTIFY all facts which support YOUR contention that Dincel Defendants'
25 October 22, 2014 letter falsely represented the character, amount and legal status of
26 the alleged debt.

1 **RESPONSE:**

2 OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has
3 no legal training. Notwithstanding and without waiving said objections,
4 Plaintiff states and alleges as follows: See the operative complaint for the
5 factual basis that the Dincel Defendants' October 22, 2014 letter falsely
6 represented the character, amount and legal status of the alleged debt
7 because Plaintiff was not legally obligated to pay the purported debts as it
8 was not his. Plaintiff reserves the right to seasonably supplement this
9 response. Discovery continues.

10 **SPECIAL INTERROGATORY 9:**

11 IDENTIFY all facts which support YOUR contention that Dincel Defendants'
12 October 22, 2014 threatened legal action which could not be legally taken or was not
13 intended to be taken.

14 **RESPONSE:**

15 OBJECTION. This special interrogatory contains a typographic error and
16 therefore is unintelligible and on that basis Plaintiff is unable to respond.

17 **SPECIAL INTERROGATORY 10:**

18 IDENTIFY all facts which support YOUR contention that Dincel Defendants'
19 October 22, 2014 communicated false information about the purported Debt.

20 **RESPONSE:**

21 OBJECTION. This special interrogatory contains a typographic error and
22 therefore is unintelligible and on that basis Plaintiff is unable to respond.

23 **SPECIAL INTERROGATORY 11:**

24 IDENTIFY all facts which support YOUR contention that Dincel Defendants'
25 October 22, 2014 used false information and deceptive means to collect the purported
26 Debt.

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1 **RESPONSE:**

2 OBJECTION. This special interrogatory contains a typographic error and
3 therefore is unintelligible and on that basis Plaintiff is unable to respond.

4 **SPECIAL INTERROGATORY 12:**

5 IDENTIFY all facts which support YOUR contention that YOU suffered actual
6 damages as a result of Defendants allegedly illegal debt collection conduct.

7 **RESPONSE:**

8 OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has
9 no legal training. Without waiving said objections, Plaintiff states and
10 alleges as follows: See the operative complaint for the factual basis for
11 Plaintiff's contention that he suffered actual damages. Plaintiff's actual
12 damages will be determined by a jury as requested in the prayer for relief
13 contained in the operative complaint, the Fed.R.Civ.P. 26(a)(1)
14 disclosures, and otherwise disclosed in discovery. Plaintiff has suffered
15 actual compensable economic harm in the form of emotional distress, lost
16 time from work, fuel charges to travel to attorney's office, and other
17 incidental expenses as a result of Defendants' violations of law. Plaintiff
18 reserves the right to seasonably supplement this response. Discovery
19 continues.

20 **SPECIAL INTERROGATORY 13:**

21 IDENTIFY any and all treatment providers which provided YOU with services
22 related to YOUR alleged actual damages as a result of Defendants allegedly illegal
23 debt collection conduct.

24 **RESPONSE:**

25 None.

26 **SPECIAL INTERROGATORY 14:**

27 DESCRIBE the legal relationship between YOU and YOUR mother Esther

Truley, including the existence of any power or attorney or conservatorship YOU may hold over her.

RESPONSE:

OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has no legal training. The request is vague with respect to the terms “describe” and “legal relationship.”

SPECIAL INTERROGATORY 15:

DESCRIBE any treatment you received relating to the actual damages you allege to have suffered as a result of Defendants' allegedly illegal debt collection conduct.

RESPONSE:

OBJECTION. Calls for legal conclusion. Plaintiff is not a lawyer and has no legal training. The request is vague with respect to the terms “describe” and “treatment.”

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST 1:

Any and all DOCUMENTS which support YOUR contention that Defendant DINCEL LAW GROUP, APC is a business the principal purpose of which is the collection of debts.

RESPONSE:

After a diligent search and/or a reasonable inquiry in an effort to comply with this request, this responding party is unable to comply with this particular request because the particular item or category has never been in the possession, custody, or control of the responding party. Any and all documents responsive to this request are in the possession, custody, or control of the requesting party.

REQUEST 2:

Any and all DOCUMENTS that support YOUR contention that Defendant KIM O. DINCEL regularly acquires and/or collects debts after they are in default.

RESPONSE:

After a diligent search and/or a reasonable inquiry in an effort to comply with this request, this responding party is unable to comply with this particular request because the particular item or category has never been in the possession, custody, or control of the responding party. Any and all documents responsive to this request are in the possession, custody, or control of the requesting party.

REQUEST 3:

Any and all DOCUMENTS that support YOUR contention that Defendant W. JOHN LO regularly acquires and/or collects debts after they are in default.

RESPONSE:

After a diligent search and/or a reasonable inquiry in an effort to comply with this request, this responding party is unable to comply with this particular request because the particular item or category has never been in the possession, custody, or control of the responding party. Any and all documents responsive to this request are in the possession, custody, or control of the requesting party.

REQUEST 4:

Any and all DOCUMENTS that support YOUR contention that Defendant DINCEL LAW GROUP, APC regularly acquires and/or collects debts after they are in default.

RESPONSE:

After a diligent search and/or a reasonable inquiry in an effort to comply with this request, this responding party is unable to comply with this

1 particular request because the particular item or category has never been
2 in the possession, custody, or control of the responding party. Any and
3 all documents responsive to this request are in the possession, custody, or
4 control of the requesting party.

5 **REQUEST 5:**

6 Any and all DOCUMENTS which support YOUR contention that each
7 Defendant in this action were the principal, agent or employee of the other.

8 **RESPONSE:**

9 After a diligent search and/or a reasonable inquiry in an effort to comply
10 with this request, this responding party is unable to comply with this
11 particular request because the particular item or category has never been
12 in the possession, custody, or control of the responding party. Any and
13 all documents responsive to this request are in the possession, custody, or
14 control of the requesting party.

15 **REQUEST 6:**

16 Any and all DOCUMENTS which support YOUR contention that at all times
17 Defendants were acting within the course and scope of their principal relationship,
18 agency, or employment.

19 **RESPONSE:**

20 After a diligent search and/or a reasonable inquiry in an effort to comply
21 with this request, this responding party is unable to comply with this
22 particular request because the particular item or category has never been
23 in the possession, custody, or control of the responding party. Any and
24 all documents responsive to this request are in the possession, custody, or
25 control of the requesting party.

26 **REQUEST 7:**

27 Any and all DOCUMENTS which support YOUR contention that Defendants

1 obtained money and/or property through fraud, negligence, misrepresentation, and
2 other wrongful and/or illegal conduct.

3 **RESPONSE:**

4 After a diligent search and/or a reasonable inquiry in an effort to comply
5 with this request, this responding party is unable to comply with this
6 particular request because the particular item or category has never been
7 in the possession, custody, or control of the responding party. Any and
8 all documents responsive to this request are in the possession, custody, or
9 control of the requesting party.

10 **REQUEST 8:**

11 Any and all DOCUMENTS which support YOUR contention that Dincel
12 Defendants' October 22, 2014 letter falsely represented the character, amount and
13 legal status of the alleged Debt.

14 **RESPONSE:**

15 Objection. Calls for legal conclusion. Responding party is not a lawyer.
16 After a diligent search and/or a reasonable inquiry in an effort to comply
17 with this request, this responding party is unable to comply with this
18 particular request because the particular item or category has never been
19 in the possession, custody, or control of the responding party. Any and
20 all documents responsive to this request are in the possession, custody, or
21 control of the requesting party and the other defendants in this action.

22 **REQUEST 9:**

23 Any and all DOCUMENTS which support YOUR contention that Dincel
24 Defendants' October 22, 2014 letter falsely represented the character, amount and
25 legal status of the alleged Debt.

26 **RESPONSE:**

27 Objection. Calls for legal conclusion. Responding party is not a lawyer.

1 After a diligent search and/or a reasonable inquiry in an effort to comply
2 with this request, this responding party is unable to comply with this
3 particular request because the particular item or category has never been
4 in the possession, custody, or control of the responding party. Any and
5 all documents responsive to this request are in the possession, custody, or
6 control of the requesting party and the other defendants in this action.

7 **REQUEST 10:**

8 Any and all DOCUMENTS which support YOUR contention that Dincel
9 Defendants' October 22, 2014 communicated false information about the purported
10 Debt.

11 **RESPONSE:**

12 Objection. Calls for legal conclusion. Responding party is not a lawyer.
13 After a diligent search and/or a reasonable inquiry in an effort to comply
14 with this request, this responding party is unable to comply with this
15 particular request because the particular item or category has never been
16 in the possession, custody, or control of the responding party. Any and
17 all documents responsive to this request are in the possession, custody, or
18 control of the requesting party and the other defendants in this action.

19 **REQUEST 11:**

20 Any and all DOCUMENTS which support YOUR contention that Dincel
21 Defendants' October 22, 2014 used false information and deceptive means to collect
22 the purported Debt.

23 **RESPONSE:**

24 Objection. Calls for legal conclusion. Responding party is not a lawyer.
25 After a diligent search and/or a reasonable inquiry in an effort to comply
26 with this request, this responding party is unable to comply with this
27 particular request because the particular item or category has never been

1 in the possession, custody, or control of the responding party. Any and
2 all documents responsive to this request are in the possession, custody, or
3 control of the requesting party and the other defendants in this action.

4 **REQUEST 12:**

5 Any and all DOCUMENTS which support YOUR contention that YOU
6 suffered actual damages as a result of Defendants allegedly illegal debt collection
7 conduct.

8 **RESPONSE:**

9 After a diligent search and/or a reasonable inquiry in an effort to comply
10 with this request, this responding party is unable to comply with this
11 particular request because the particular item or category has never
12 existed.

13 **REQUEST 13:**

14 Any and any and all DOCUMENTS substantiating YOUR claims that YOU
15 suffered actual damages as a result of Defendants allegedly illegal debt collection
16 conduct.

17 **RESPONSE:**

18 After a diligent search and/or a reasonable inquiry in an effort to comply
19 with this request, this responding party is unable to comply with this
20 particular request because the particular item or category has never
21 existed.

22 **REQUEST 14:**

23 Any and any and all DOCUMENTS evidencing any legal relationship,
24 including any power or attorney or conservatorship, YOU may hold over YOUR
25 mother Esther Truley.

26 **RESPONSE:**

27 After a diligent search and/or a reasonable inquiry in an effort to comply

1 with this request, this responding party is unable to comply with this
2 particular request because the particular item or category has never
3 existed.

4 **REQUESTS FOR ADMISSION**

5 **REQUEST FOR ADMISSION 1:**

6 Admit that YOU are currently financially responsible for YOUR mother, Esther
7 Truley.

8 **RESPONSE:**

9 OBJECTION vague with respect to the phrase "financially responsible."

10 In addition, the request is irrelevant and not reasonably calculated to lead
11 to the discovery of admissible evidence. Notwithstanding the stated
12 objections, DENIED.

13 **REQUEST FOR ADMISSION 2:**

14 Admit that YOU were financially responsible for YOUR mother, Esther Truley,
15 between March 2014 and November 2014.

16 **RESPONSE:**

17 OBJECTION vague with respect to the phrase "financially responsible."

18 In addition, the request is irrelevant and not reasonably calculated to lead
19 to the discovery of admissible evidence. Notwithstanding the stated
20 objections, DENIED.

21 **REQUEST FOR ADMISSION 3:**

22 Admit that YOU hold a power of attorney over YOUR mother, Esther Truley.

23 **RESPONSE:**

24 OBJECTION vague with respect to the phrase "hold power of attorney
25 over." In addition, the request is irrelevant and not reasonably calculated
26 to lead to the discovery of admissible evidence. Notwithstanding the
27 stated objections, DENIED.

1 **REQUEST FOR ADMISSION 4:**

2 Admit that YOU are the conservator of YOUR mother, Esther Truley.

3 **RESPONSE:**

4 OBJECTION. The request is irrelevant and not reasonably calculated to
5 lead to the discovery of admissible evidence. Notwithstanding the stated
6 objection, DENIED.

7 **REQUEST FOR ADMISSION 5:**

8 Admit that YOU held a power of attorney over YOUR mother, Esther Truley
9 between March 2014 and November 2014.

10 **RESPONSE:**

11 OBJECTION. The request is irrelevant and not reasonably calculated to
12 lead to the discovery of admissible evidence. Notwithstanding the stated
13 objection, DENIED.

14 **REQUEST FOR ADMISSION 6:**

15 Admit that YOU were the conservator of YOUR mother, Esther Truley between
16 March 2014 and November 2014.

17 **RESPONSE:**

18 OBJECTION vague with respect to the phrase "hole power of attorney
19 over." Notwithstanding the stated objection, DENIED.

20 **REQUEST FOR ADMISSION 7:**

21 Admit that YOU can exercise control over YOUR mother, Esther Truley's
22 finances.

23 **RESPONSE:**

24 DENIED.

25 **REQUEST FOR ADMISSION 8:**

26 Admit that YOU could exercise control over YOUR mother, Esther Truley's
27 finances between March 2014 and November 2014.

1 **RESPONSE:**

2 OBJECTION. The request calls for speculation. In addition, the request
3 is irrelevant and not reasonably calculated to lead to the discovery of
4 admissible evidence, and on that basis DENIES.

5 **REQUEST FOR ADMISSION 9:**

6 Admit that Alta Vista Healthcare and Wellness center was not fully
7 compensated for the services rendered on behalf of YOUR mother, Esther Truley.

8 **RESPONSE:**

9 Plaintiff is without sufficient information to either admit or deny and
10 therefore DENIES.

11 **REQUEST FOR ADMISSION 10:**

12 Admit that YOUR mother, Esther Truley, received healthcare services at Alta
13 Vista Healthcare and Wellness Center in 2014.

14 **RESPONSE:**

15 OBJECTION. The request is vague with respect to the phrase "healthcare
16 services." Notwithstanding the stated objection, Plaintiff ADMITS his
17 mother sought admission to Alta Vista Healthcare and Wellness Center in
18 2014.

19 **REQUEST FOR ADMISSION 11:**

20 Admit that YOU signed the Alta Vista Healthcare and Wellness Center as
21 YOUR mother, Esther Truley's, representative on or about April 5, 2014.

22 **RESPONSE:**

23 OBJECTION. The request contains a typographical error that makes the
24 request unintelligible. Plaintiff further objects to the term
25 "representative." Notwithstanding the stated objection, to the extent the
26 request asks if Plaintiff signed any papers or documents related to his
27 mother's attempt to seek admission into Alta Vista Healthcare and

Wellness Center, he ADMITS.

REQUEST FOR ADMISSION 12:

Admit that YOU have not sought healthcare services as a result of YOUR alleged emotional distress as described in YOUR COMPLAINT.

RESPONSE.

OBJECTION. The request is vague with respect to the term, "healthcare services." To the extent the request asks if Plaintiff to admit it has not sought care from a medical doctor, and to that extent only, Plaintiff
ADmits

REQUEST FOR ADMISSION 13:

Admit that YOU have not sought treatment of any kind as a result of YOUR alleged emotional distress as described in YOUR COMPLAINT.

RESPONSE:

OBJECTION. The request is vague with respect to the term, "treatment of any kind." To the extent the request asks if Plaintiff to admit he has not sought care from a medical doctor, and to that extent only, Plaintiff **ADmits**

Dated: January 31, 2016

/s/ James Truley

James Truley

AS TO FORM AND OBJECTIONS ONLY:

Dated: January 31, 2016

STONE LAW FIRM

By: /s/ Elliott H. Stone
Elliott H. Stone, Esq.
Attorney for Plaintiff

PROOF OF SERVICE

I am and was at all times herein mentioned over the age of 18 years and not a party to the action in which this service is made. At all times herein mentioned I have been employed in the Los Angeles County in the office of a member of the bar of this court at whose direction the service was made. My business address is 6601 Center Drive, Suite 500, Los Angeles, CA 90045.

On January 31, 2016, I served the following document(s):

PLAINTIFF'S RESPONSES TO DEFENDANTS DINCEL LAW GROUP APC, KIM O. DINCEL AND W. JOHN LO'S FIRST SET OF SPECIALLY PREPARED INTERROGATORIES, FIRST SET OF REQUESTS FOR ADMISSION, AND REQUESTS FOR PRODUCTION OF DOCUMENTS SET ONE

On the following parties:

José-Manuel A. de Castro, Esq.
DE CASTRO LAW GROUP, P.C.
9000 W. Sunset Boulevard, Suite 450
Los Angeles, California 90069

Attorneys for Defendants Shlomo Rechnitz, Rockport Administrative Services, LLC, Riverside Healthcare & Wellness Centre, LLC, Tim Garcia and Cecilia Machado

John G. Dooling, Esq.
Christopher Mazetti, Esq.
1001 Marshall Street, Suite 500
Redwood City CA 94063-2052

Attorneys for defendants Dincel Law Group, Kim I. Dincel, and W. John Lo.

By US Mail and email.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 31, 2016, Los Angeles, California.

Donald L. Werner

Leonard J. Scheiner